

6" 5" 06"

CURTIS COLLINS

"PLAINTIFF"

CA. 105-CV-739

VS.

Dick KEARNEY ET AL.

DEFENDANTS



NOW COMES THE ABOVE PLAINTIFF WITH THE CASE AT HAND TO ASK THIS HONORABLE COURT TO GRANT THIS MOTION TO HAVE A DEPOSITION ORDER SO THE COURTS WILL FULLY UNDERSTAND THIS CASE ALSO IT WILL SAVE THE COURTS A LOT MONEY & TIME

THE PLAINTIFF FEELS AND BELIEVES THAT IT IS NECESSARY TO ORDER A DEPOSITION"

THIS WILL NOT ONLY HELP THIS CASE AGAINST THE ABOVE DEFENDANTS BUT WILL ALSO ALLOW THE COURTS MORE INFORMATION THAT IS NEEDED TO SHOW CAUSE AND FAULT WITH THE CLAIMS FILED AGAINST THE ABOVE DEFENDANTS. THEREFORE

THE PLAINTIFF RESPECTFULLY ASK THAT THIS COURT WILL GRANT THIS MOTION AND ORDER THE ABOVE DEFENDANTS ALSO HAVE A DEPOSITION HEARING ALSO THE PLAINTIFF FEELS THAT IT WOULD BE WISE THAT GIVEN A ORDER TO A DEPOSITION HEARING THAT ALL DEFENDANTS SHOULD BE "DONE" SEPARATELY

6" 5" 0" 6"

CA. 105 CV 739

SO THAT THEY CANT COMPARE  
NOTE?

THE PLAINTIFF HAS A GOOD NUMBER OF  
QUESTION FOR EACH DEFENDANTS BUT OF  
THE SAME FORM.

AND, THEREFORE WISHES TO ASK EACH  
DEFENDANT'S "SEPARATELY"  
"

THIS WILL NOT ONLY BRING OUT THE TRUTH  
IN WHAT HAPPENED BUT WILL ALSO SHOW  
THE SERIOUSNESS OF UNPROFESSIONAL  
THAT IS GOING ON IN DELAWARE PRISON  
SYSTEM THE UNFAIR TREATMENT OF

"ELIMATES"  
" " "RESPECTFULLY

"SUBMITTED"

SIGNATURE

Curtis B. Caldwell  
Pro. SE

ERIKA Y  
TROSS #  
4506

COPY #  
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ALL DEFENDANT'S HATE

.C.C.

C.C.

ALL OF THE DEFENDANTS  
HAS BEEN SERVED THROUGH  
ERIKAY TROSS #4506  
DEPT OF JUSTICE STATE  
B.L.D.G. AT 820 NORTH  
FRENCH ST  
WILM, DEL  
19801-3509

IM Curtis Collins  
SB# 314128 UNIT C-U-3

DELAWARE CORRECTIONAL CENTER

116 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WILMINGTON, DE 19850

JUN

16

*[Handwritten scribble]*

"CLERK OF THE COURT"

844 N. KING STREET

Lock box 18

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19801-3570